

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

KTRV LLC, *et al.*,¹

Debtors.

Chapter 11

Case No. 25-10601 (MFW)

(Jointly Administered)

**AMENDED² NOTICE OF AGENDA OF MATTERS SCHEDULED
FOR HEARING ON MAY 13, 2025 AT 10:30 A.M. (ET)**

THIS HEARING WILL BE CONDUCTED BY ZOOM. PARTIES AND WITNESSES ARE PERMITTED, BUT NOT REQUIRED, TO APPEAR IN PERSON. THE COURT HAS NO PREFERENCE.

**TO ATTEND THE HEARING REMOTELY, PLEASE REGISTER USING THE ECOURT APPEARANCES TOOL ON THE COURT'S WEBSITE AT WWW.DEB.USCOURTS.GOV OR
CLICK THE BELOW LINK:**

<https://ecf.deb.uscourts.gov/cgi-bin/nysbAppearances.pl>

PARTIES ARE REQUIRED TO REGISTER FOR THE HEARING NO LATER THAN 4:00 P.M. (ET) ONE BUSINESS DAY BEFORE THE HEARING. YOU MUST USE YOUR FULL NAME WHEN LOGGING INTO ZOOM OR YOU WILL NOT BE ALLOWED INTO THE MEETING.

AFTER REGISTERING YOUR APPEARANCE, YOU WILL RECEIVE A CONFIRMATION EMAIL. ZOOM INFORMATION WILL BE SENT OUT PRIOR TO THE HEARING.

MATTERS GOING FORWARD:

1. Debtors' Motion for Entry of Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed March 30, 2025; [Docket No. 14](#)].

Objection Deadline: May 13, 2025 at 4:00 p.m.

Objection/Response(s) Received:

¹ The Debtors in these chapter 11 cases, along with each the last four digits of each Debtor's tax identification number, are as follows: KTRV LLC (9993), Heritage Coal & Natural Resources, LLC (8326). The Debtors' service address is 1521 Concord Pike, Suite 201, Wilmington, DE 19803.

² Amended items appear in **BOLD**.

- A. [SEALED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 10, 2025; Docket No. 87].
- B. [UNSEALED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Debtors Motion for Entry of Interim and Final Orders (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 15, 2025; [Docket No. 101](#)].
- C. Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 29, 2025; [Docket No. 172](#)].

Related Documents:

- A. Declaration of Brian Ryniker in Support of the Debtors' Chapter 11 Petitions and First Day Pleadings [Filed March 31, 2025; [Docket No. 15](#)].
- B. Certification of Counsel Regarding Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 2, 2025; [Docket No. 43](#)].
- C. Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered April 2, 2025; [Docket No. 57](#)].
- D. Omnibus Notice of First Day Motions and Final Hearing Thereon [Filed April 5, 2025; [Docket No. 72](#)].
- E. Certification of Counsel Regarding Second Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 17, 2025; [Docket No. 122](#)].
- F. Second Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered April 17, 2025; [Docket No. 132](#)].

- G. Certification of Counsel Regarding Third Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed April 23, 2025; [Docket No. 152](#)].
- H. Third Interim Order (I) Authorizing Debtors and Debtors in Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered April 23, 2025; [Docket No. 153](#)].
- I. Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 5, 2025 at 11:30 a.m. (ET) [Filed May 2, 2025; [Docket No. 191](#)].
- J. Declaration of Brian Ryniker, Chief Restructuring Officer In Support Of The Debtors Motion For Approval Of Settlement With Bedrock Industries Investco 1 LLC And Motion For Approval Of Postpetition Financing And Use Of Cash Collateral [Filed May 2, 2025; [Docket No. 192](#)].
- K. Certification of Counsel Regarding Fourth Interim Order (I) Authorizing Debtors and Debtors In Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed May 2, 2025; [Docket No. 195](#)].
- L. Fourth Interim Order (I) Authorizing Debtors and Debtors In Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered May 5, 2025; [Docket No. 205](#)].
- M. The Debtors' Witness and Exhibit List for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 8, 2025; [Docket No. 222](#)].
- N. Notice of Filing of Revised Exhibit [Filed May 9, 2025; [Docket No. 227](#)].
- O. Notice of Filing of Proposed Fifth Interim Order (I) Authorizing Debtors and Debtors In Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Filed May 9, 2025; [Docket No. 230](#)].
- P. Fifth Interim Order (I) Authorizing Debtors and Debtors In Possession to (A) Use Cash Collateral and (B) Grant Adequate Protection to the Prepetition Lender; (II) Modifying the Automatic Stay; and (III) Granting Related Relief [Entered May 9, 2025; [Docket No. 234](#)].

- Q. Amended Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 9, 2025; [Docket No. 233](#)].

Status: On May 9, 2025, the Court entered a fifth interim Order approving the use of cash collateral. The Debtors will be filing a motion for approval of postpetition financing and use of cash collateral, for which they will be seeking expedited consideration on May 15, 2025 at 9:30 a.m.

2. Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement With Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 1, 2025; [Docket No. 26](#)].

Objection Deadline: April 10, 2025 at 4:00 p.m. (ET); extended to April 11, 2025 at 4:00 p.m. (ET) for Robindale Coal Sales LLC; extended to April 29, 2025 at 12:00 p.m. (ET) for the Official Committee of Unsecured Creditors.

Objection/Response(s) Received:

- A. Objection and Reservation of Rights of Robindale Coal Sales, LLC, and Robindale Export, LLC to Debtors Motion for (I) Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC with Respect to the Strict Foreclosure and Foreclosed Equipment; and (II) Shortening the Notice Period with Respect to the Motion [Filed April 4, 2025; [Docket No. 68](#)].
- B. United States Trustee's Objection to Motion of the Debtors and Debtors-in-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019(b) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC with Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 10, 2025; [Docket No. 83](#)].
- C. [SEALED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to the Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) And 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 10, 2025; Docket No. 86].
- D. [REDACTED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to the Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) And 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement with Bedrock Industries Investco

1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 15, 2025; [Docket No. 100](#)].

- E. [UNSEALED] Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to the Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) And 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 15, 2025; [Docket No. 101](#)].
- F. Preliminary Objection of the Official Committee of Unsecured Creditors to the Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 29, 2025; [Docket No. 170](#)].
- G. Bedrock Industries Investco 1 LLC's Statement in Support of and Reply to Objections to Motion of the Debtors and Debtors-in-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019 (b) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC with Respect to the Strict Foreclosure and Foreclosed Equipment [Filed May 1, 2025; [Docket No. 187](#)].

Related Documents:

- A. Debtors' Motion for Entry of an Order Shortening the Notice Period with Respect to the Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement With Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 1, 2025; [Docket No. 27](#)].
- B. Notice of Status Conference Scheduled for April 4, 2025 at 11:30 a.m. (ET) [Filed April 2, 2025; [Docket No. 61](#)].
- C. Motion of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to File Under Seal Exhibits to the Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to the Motion of the Debtors and Debtors-In-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) And 363 and Fed. R. Bankr. P. 9019(B) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed April 15, 2025; [Docket No. 99](#)].

- D. Bedrock Industries Investco 1 LLC's Motion for Leave to File and Serve a Late Statement in Support of and Reply to Objections to Motion of the Debtors and Debtors-in-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019 (b) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC with Respect to the Strict Foreclosure and Foreclosed Equipment Filed May 1, 2025; [Docket No. 188](#)].
- E. Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 5, 2025 at 11:30 a.m. (ET) [Filed May 2, 2025; [Docket No. 191](#)].
- F. Declaration of Brian Ryniker, Chief Restructuring Officer In Support Of The Debtors Motion For Approval Of Settlement With Bedrock Industries Investco 1 LLC And Motion For Approval Of Postpetition Financing And Use Of Cash Collateral [Filed May 2, 2025; [Docket No. 192](#)].
- G. Order Granting Bedrock Industries Investco 1 LLC's Motion for Leave to File and Serve a Late Statement in Support of and Reply to Objections to Motion of the Debtors and Debtors-in-Possession for Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019 (b) Authorizing and Approving a Global Settlement with Bedrock Industries Investco 1 LLC with Respect to the Strict Foreclosure and Foreclosed Equipment [Entered May 5, 2025; [Docket No. 204](#)].
- H. The Debtors' Witness and Exhibit List for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 8, 2025; [Docket No. 222](#)].
- I. Notice of Filing of Revised Exhibit [Filed May 9, 2025; [Docket No. 227](#)].
- J. Notice of Filing of Revised Proposed Order Pursuant to 11 U.S.C. §§ 105(a) and 363 and Fed. R. Bankr. P. 9019(b) Authorizing and Approving a Global Settlement With Bedrock Industries Investco 1 LLC With Respect to the Strict Foreclosure and Foreclosed Equipment [Filed May 9, 2025; [Docket No. 229](#)].
- K. Amended Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 9, 2025; [Docket No. 233](#)].

Status: This matter is going forward.

- 3. Debtors' Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed April 23, 2025; [Docket No. 156](#)].

Objection Deadline: April 29, 2025 at 4:00 p.m. (ET); extended to May 1, 2025 at 12:00 p.m. (ET) for Caterpillar Financial Services Corporation.

Objection/Response(s) Received:

- A. Informal comments from Caterpillar Financial Services Corporation.
- B. Commonwealth of Pennsylvania, Department of Environmental Protection Response and Reservation of Rights to Debtors' Bidding Procedures Motion [Filed April 29, 2025; [Docket No. 173](#)].
- C. United States Trustee's Reservation of Rights in Response to Debtors' Motion for Entry of an Order, Inter Alia, Approving Bidding Procedures [Filed April 29, 2025; [Docket No. 174](#)].
- D. Objection of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Debtors Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling An Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors Assets Free and Clear, and (VII) Granting Related Relief [Filed April 29, 2025; [Docket No. 175](#)].
- E. Preliminary Objection of the Official Committee of Unsecured Creditors to Debtors' Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed April 29, 2025; [Docket No. 176](#)].
- F. Objection and Reservation of Rights of Robindale Coal Sales, LLC, and Robindale Export, LLC to Debtors Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors Assets Free and Clear, and (VII) Granting Related Relief [Filed April 29, 2025; [Docket No. 179](#)].

Related Documents:

- A. Debtors' Motion for Entry of an Order Shortening the Notice Period With Respect to the Debtors' Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed April 23, 2025; [Docket No. 157](#)].
- B. Order Shortening the Notice Period With Respect to the Debtors' Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed April 25, 2025; [Docket No. 162](#)].
- C. Notice of Hearing on Debtors' Motion for Entry of an Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed April 25, 2025; [Docket No. 164](#)].
- D. Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 5, 2025 at 11:30 a.m. (ET) [Filed May 2, 2025; [Docket No. 191](#)].
- E. Notice of Filing of Revised Proposed Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed May 4, 2025; [Docket No. 199](#)].
- F. The Debtors' Witness and Exhibit List for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 8, 2025; [Docket No. 222](#)].
- G. Notice of Filing of Revised Exhibit [Filed May 9, 2025; [Docket No. 227](#)].
- H. Notice of Filing of Further Revised Proposed Order (I) Approving the Bidding Procedures, (II) Authorizing the Debtors to Enter Into One or More Stalking Horse Agreements and Provide Bid Protections, (III) Approving the Form and Manner of

Sale Notice, (IV) Scheduling an Auction and Sale Hearing, (V) Approving the Procedures for the Assumption and Assignment of Contracts, (VI) Approving the Sale of the Debtors' Assets Free and Clear, and (VII) Granting Related Relief [Filed May 9, 2025; [Docket No. 228](#)].

- I. Amended Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 9, 2025; [Docket No. 233](#)].

Status: The Debtors received informal comments to the Bid Procedures Motion from Caterpillar Financial Services Corporation, which have been resolved. The Debtors have filed a further revised form of proposed order to address some of the issues raised in the objections. This matter is going forward.

4. Debtors' Application for (I) the Retention and Employment of Ritchie Bros. Auctioneers, Inc. as Auctioneer, *Nunc Pro Tunc* to April 24, 2025, (II) Authorizing the Sale of Equipment Free and Clear of All Liens, Claims and Encumbrances; and (III) Granting Related Relief [Filed April 25, 2025; [Docket No. 165](#)].

Objection Deadline: At the hearing.

Objection/Response(s) Received:

- A. Informal questions from the U.S. Trustee.

Related Documents:

- A. Debtors' Motion for Entry of an Order Shortening the Notice Period with Respect to the Debtors' Application for (I) The Retention and Employment of Ritchie Bros. Auctioneers, Inc. as Auctioneer, *Nunc Pro Tunc* to April 24, 2025, (II) Authorizing the Sale of Equipment Free and Clear of All Liens, Claims and Encumbrances; and (III) Granting Related Relief [Filed April 25, 2025; [Docket No. 166](#)].
- B. Order Shortening the Notice Period with Respect to the Debtors' Application for (I) The Retention and Employment of Ritchie Bros. Auctioneers, Inc. as Auctioneer, *Nunc Pro Tunc* to April 24, 2025, (II) Authorizing the Sale of Equipment Free and Clear of All Liens, Claims and Encumbrances; and (III) Granting Related Relief [Filed April 28, 2025; [Docket No. 169](#)].
- C. The Debtors' Witness and Exhibit List for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 8, 2025; [Docket No. 222](#)].
- D. Notice of Filing of Revised Exhibit [Filed May 9, 2025; [Docket No. 227](#)].

E. Notice of Filing of Revised Exhibit to Debtors' Application for (I) the Retention and Employment of Ritchie Bros. Auctioneers, Inc. as Auctioneer, *Nunc Pro Tunc* to April 24, 2025, (II) Authorizing the Sale of Equipment Free and Clear of All Liens, Claims and Encumbrances; and (III) Granting Related Relief [Filed May 12, 2025; [Docket No. 237](#)].

Status: The Debtors have received informal questions from the U.S. Trustee, which the Debtors and Ritchie Bros. are attempting to address in advance of the hearing. This matter is going forward.

5. Motion of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Compel Full Access to Data Room and Debtor Information In Connection with Sale [Filed April 29, 2025; [Docket No. 177](#)].

Objection Deadline: At the hearing.

Objection/Response(s) Received:

- A. Debtors' Objection to the Motion of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Compel Full Access to Data Room and Debtor Information In Connection with Sale [Filed May 1, 2025; [Docket No. 189](#)].

Related Documents:

- A. Motion of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Expedited Consideration and to Shorten Notice on Motion of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Compel Full Access to Data Room and Debtor Information In Connection with Sale [Filed April 29, 2025; [Docket No. 178](#)].
- B. Order Shortening Notice on Motion of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC to Compel Full Access to Data Room and Debtor Information In Connection with Sale [Entered May 1, 2025; [Docket No. 184](#)].
- C. Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 5, 2025 at 11:30 a.m. (ET) [Filed May 2, 2025; [Docket No. 191](#)].
- D. The Debtors' Witness and Exhibit List for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 8, 2025; [Docket No. 222](#)].
- E. Notice of Filing of Revised Exhibit [Filed May 9, 2025; [Docket No. 227](#)].

F. Amended Witness and Exhibit List of Angela Svonavec, Jason Svonavec, and Heritage Holding Co., LLC for Hearing on May 9, 2025 at 3:00 p.m. (ET) [Filed May 9, 2025; [Docket No. 233](#)].

Status: This matter is going forward.

Dated: May 12, 2025
Wilmington, Delaware

MORRIS JAMES LLP

/s/ Jeffrey R. Waxman

Jeffrey R. Waxman (DE Bar No. 4159)

Eric J. Monzo (DE Bar No. 5214)

Christopher M. Donnelly (DE Bar No. 7149)

500 Delaware Avenue, Suite 1500

Wilmington, DE 19801

Telephone: (302) 888-6800

Facsimile: (302) 571-1750

E-mail: jwaxman@morrisjames.com

emonzo@morrisjames.com

cdonnelly@morrisjames.com

*Proposed Counsel to the Debtors and Debtors
in Possession*